



ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION
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December 13, 2011

Mr. Stephen Gwin (*Sent via E-mail to: gwst@chevron.com*)
Chevron Pipe Line Company
4800 Fournace Place
Bellaire, TX 77401-2324

Subject: Work Plan Review for SLIC Case No. RO0002892 and GeoTracker Global ID SL0600100443, Chevron Sunol Pipeline, 2793 Calaveras Road, Sunol, CA 94586

Dear Mr. Gwin:

Alameda County Environmental Health (ACEH) staff has reviewed the case file for the above-referenced site including the recently submitted document entitled, "2011 Investigation Workplan, SLIC Case RO0002892, Chevron Pipeline Company, Sunol Spill, 2793 Calaveras Road, Sunol, CA," dated December 1, 2011 (Work Plan). The Work Plan, which was prepared on behalf of Chevron Pipe Line Company by URS Corporation, proposes an updated biological survey and installation of two monitoring wells. The Work Plan is based in part upon data gaps identified in a report entitled, "Conceptual Site Model, SLIC Case RO0002892, Chevron Pipeline Company, Sunol Spill, 2793 Calaveras Road, Sunol, CA," dated October 28, 2010 (CSM).

We request that you submit a Revised Work Plan that addresses the technical comments below. Specific items that require revision are identified below.

TECHNICAL COMMENTS

- 1. Pumping Test and Cleanup Goals.** The performance of a pumping test for the purpose of providing data to indicate that groundwater in the area of the site does not have a drinking water beneficial use does not appear to provide significant benefit for the project. In addition, a short-term pumping test using a monitoring well has limited technical value to assess aquifer capacity. As we have pointed out previously, low-risk criteria for closure of petroleum case may be applied to the site. Low-risk fuel leak case closure does not require that cleanup goals be achieved at the time of closure but will be achieved prior to the likely use of the groundwater for its designated beneficial use. However, the application of low-risk criteria requires that site characterization and source removal are complete. We recommend that you focus on achieving these two objectives to meet the requirements for low-risk fuel case closure.
- 2. Proposed Well Installations.** ACEH previously concurred with the conclusion of the 2010 SCM that the installation of additional shallow wells is needed along the eastern side of Calaveras Road to monitor contaminant migration from the hillside source area. The Work Plan proposes installation of monitoring wells 50 feet north and south of existing well MW-8. However, the Work Plan indicates that monitoring wells will not be installed if evidence of contamination is observed in soil samples during advancement of the soil boring. Instead, the Work Plan proposes installation of wells further from well MW-8 and only outside any areas with evidence of contamination. This proposal is not acceptable because it does not include collection of data to monitor contaminant migration from the

hillside source area. We request that the Work Plan be revised to include one of the two following options:

- Advance a transect of soil borings along the eastern side of Calaveras Road with continuous soil sampling in each boring to define the stratigraphy. Use the stratigraphic information to collect depth-discrete grab groundwater samples and delineate the extent of groundwater contamination. Installation of one monitoring well north and south of MW-8 is to be based on the results of the grab groundwater sampling.
- Install monitoring wells 50 feet north and 50 feet south of MW-8. If evidence of soil contamination is observed in the boring for either monitoring well, install an additional well 100 feet north or south of MW-8.

- 3. Depth of Hillside Source Area Impacts.** The October 28, 2011 CSM indicates that the depths and concentrations of the remaining impacts in the hillside are not known and identified the depth of hillside source area impacts as a data gap. ACEH concurred that the vertical extent of contamination in the hillside area is a data gap that should be addressed. In particular, evaluating the distribution of the source mass and pathway for contaminants to reach the gravel layer intersected by well MW-8 at the base of the hillside may warrant further efforts. However, no plans to assess the vertical extent of soil impacts on the hillside were presented in the Work Plan. Please include plans in the Revised Work Plan requested below to address this data gap.
- 4. Resuming Site Remediation.** On July 23, 2009, Chevron Pipe Line Company made a decision to discontinue soil vapor extraction (SVE) at the site. ACEH did not concur with termination of the remediation since operation of the SVE system continued to remove contaminant mass in the source area. A passive soil vapor survey conducted in 2009 showed higher concentrations of TPH and BTEX at several soil vapor sampling locations on the hillside below the pipeline release. These findings indicate that petroleum hydrocarbons remain in shallow soil on the hillside and provide target areas for completion of source area treatment.
- 5. Water Well Survey Information.** The Work Plan and the October 28, 2011 CSM refer to a water well search conducted in 2009 for a 14-mile section of the pipeline in stating that no water supply wells are within two miles of the site. In correspondence dated December 9, 2010, ACEH previously requested that you provide the supporting documentation for this conclusion. Please present this information in the Revised Work Plan requested below. If you are not able to provide complete supporting documentation, you are required to conduct a detailed well survey to locate water supply wells within ½ mile of the site by obtaining well information from both the Zone 7 Water Agency and the State of California Department of Water Resources, at a minimum. Submittal of maps showing the location of all wells identified in your study, and the use of tables to report the data collected as part of your survey are required. Please provide a table that includes the well designation, location, total depth, diameter, screen interval, date of well installation, current status, historic use, and owner of the wells. In addition, please provide well logs and completion records for wells downgradient from the site that are potential receptors. Please present your results in the Revised Work Plan requested below.

Mr. Stephen Gwin,
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TECHNICAL REPORT REQUEST

Please submit technical reports to Alameda County Environmental Health (Attention: Jerry Wickham), according to the following schedule:

- **March 3, 2012** – Revised Work Plan
- **May 17, 2012** – Groundwater Monitoring Report for First Quarter 2012
- **November 15, 2012** – Groundwater Monitoring Report for Third Quarter 2011

If you have any questions, please call me at (510) 567-6791 or send me an electronic mail message at jerry.wickham@acgov.org. Case files can be reviewed online at the following website: <http://www.acgov.org/aceh/index.htm>.

Sincerely,

Jerry Wickham, California PG 3766, CEG 1177, and CHG 297
Senior Hazardous Materials Specialist

Attachment: Responsible Party(ies) Legal Requirements/Obligations
Enclosure: ACEH Electronic Report Upload (ftp) Instructions

cc: Cheryl Dizon (QIC 8021), Zone 7 Water Agency, 100 North Canyons Pkwy, Livermore, CA 94551
(Sent via E-mail to: cdizon@zone7water.com)

Joe Morgan III, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: joe_morgan@urscorp.com)

Jacob Henry, URS Corporation, 1333 Broadway, Suite 800, Oakland, CA 94612 (Sent via E-mail to: jacob_henry@urscorp.com)

Joe Naras, San Francisco Public Utilities Commission, Natural Resources Division
1657 Rollins Road, Burlingame, CA 94010

Craig Freeman, San Francisco Public Utilities Commission, Environmental and Regulatory Compliance Division, 1145 Market Street, Suite 500, San Francisco, CA 94103 (Sent via E-mail to: CFreeman@sfwater.org)

Donna Drogos, ACEH (Sent via E-mail to: donna.drogos@acgov.org)
Jerry Wickham, ACEH (Sent via E-mail to: jerry.wickham@acgov.org)
GeoTracker, eFile

Attachment 1

Responsible Party(ies) Legal Requirements / Obligations

REPORT REQUESTS

These reports are being requested pursuant to California Health and Safety Code Section 25296.10. 23 CCR Sections 2652 through 2654, and 2721 through 2728 outline the responsibilities of a responsible party in response to an unauthorized release from a petroleum UST system, and require your compliance with this request.

ELECTRONIC SUBMITTAL OF REPORTS

ACEH's Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of reports in electronic form. The electronic copy replaces paper copies and is expected to be used for all public information requests, regulatory review, and compliance/enforcement activities. Instructions for submission of electronic documents to the Alameda County Environmental Cleanup Oversight Program FTP site are provided on the attached "Electronic Report Upload Instructions." Submission of reports to the Alameda County FTP site is an addition to existing requirements for electronic submittal of information to the State Water Resources Control Board (SWRCB) GeoTracker website. In September 2004, the SWRCB adopted regulations that require electronic submittal of information for all groundwater cleanup programs. For several years, responsible parties for cleanup of leaks from underground storage tanks (USTs) have been required to submit groundwater analytical data, surveyed locations of monitoring wells, and [other](#) data to the GeoTracker database over the Internet. Beginning July 1, 2005, these same reporting requirements were added to Spills, Leaks, Investigations, and Cleanup (SLIC) sites. Beginning July 1, 2005, electronic submittal of a complete copy of all reports for all sites is required in GeoTracker (in PDF format). Please visit the SWRCB website for more information on these requirements (http://www.waterboards.ca.gov/water_issues/programs/ust/electronic_submittal/).

PERJURY STATEMENT

All work plans, technical reports, or technical documents submitted to ACEH must be accompanied by a cover letter from the responsible party that states, at a minimum, the following: "I declare, under penalty of perjury, that the information and/or recommendations contained in the attached document or report is true and correct to the best of my knowledge." This letter must be signed by an officer or legally authorized representative of your company. Please include a cover letter satisfying these requirements with all future reports and technical documents submitted for this fuel leak case.

PROFESSIONAL CERTIFICATION & CONCLUSIONS/RECOMMENDATIONS

The California Business and Professions Code (Sections 6735, 6835, and 7835.1) requires that work plans and technical or implementation reports containing geologic or engineering evaluations and/or judgments be performed under the direction of an appropriately registered or certified professional. For your submittal to be considered a valid technical report, you are to present site specific data, data interpretations, and recommendations prepared by an appropriately licensed professional and include the professional registration stamp, signature, and statement of professional certification. Please ensure all that all technical reports submitted for this fuel leak case meet this requirement.

UNDERGROUND STORAGE TANK CLEANUP FUND

Please note that delays in investigation, later reports, or enforcement actions may result in your becoming ineligible to receive grant money from the state's Underground Storage Tank Cleanup Fund (Senate Bill 2004) to reimburse you for the cost of cleanup.

AGENCY OVERSIGHT

If it appears as though significant delays are occurring or reports are not submitted as requested, we will consider referring your case to the Regional Board or other appropriate agency, including the County District Attorney, for possible enforcement actions. California Health and Safety Code, Section 25299.76 authorizes enforcement including administrative action or monetary penalties of up to \$10,000 per day for each day of violation.

Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC)	REVISION DATE: July 20, 2010
	ISSUE DATE: July 5, 2005
	PREVIOUS REVISIONS: October 31, 2005; December 16, 2005; March 27, 2009; July 8, 2010
SECTION: Miscellaneous Administrative Topics & Procedures	SUBJECT: Electronic Report Upload (ftp) Instructions

The Alameda County Environmental Cleanup Oversight Programs (LOP and SLIC) require submission of all reports in electronic form to the county's ftp site. Paper copies of reports will no longer be accepted. The electronic copy replaces the paper copy and will be used for all public information requests, regulatory review, and compliance/enforcement activities.

REQUIREMENTS

- **Please do not submit reports as attachments to electronic mail.**
- Entire report including cover letter must be submitted to the ftp site as **a single portable document format (PDF) with no password protection.**
- It is **preferable** that reports be converted to PDF format from their original format, (e.g., Microsoft Word) rather than scanned.
- **Signature pages and perjury statements must be included and have either original or electronic signature.**
- **Do not password protect the document.** Once indexed and inserted into the correct electronic case file, the document will be secured in compliance with the County's current security standards and a password. **Documents with password protection will not be accepted.**
- Each page in the PDF document should be rotated in the direction that will make it easiest to read on a computer monitor.
- Reports must be named and saved using the following naming convention:

RO#_Report Name_Year-Month-Date (e.g., RO#5555_WorkPlan_2005-06-14)

Submission Instructions

- 1) Obtain User Name and Password
 - a) Contact the Alameda County Environmental Health Department to obtain a User Name and Password to upload files to the ftp site.
 - i) Send an e-mail to deh.loptoxic@acgov.org
 - b) In the subject line of your request, be sure to include "**ftp PASSWORD REQUEST**" and in the body of your request, include the **Contact Information, Site Addresses,** and the **Case Numbers (RO# available in Geotracker) you will be posting for.**
- 2) Upload Files to the ftp Site
 - a) Using Internet Explorer (IE4+), go to <ftp://alcoftp1.acgov.org>
 - (i) Note: Netscape, Safari, and Firefox browsers will not open the FTP site as they are NOT being supported at this time.
 - b) Click on Page located on the Command bar on upper right side of window, and then scroll down to Open FTP Site in Windows Explorer.
 - c) Enter your User Name and Password. (Note: Both are Case Sensitive.)
 - d) Open "My Computer" on your computer and navigate to the file(s) you wish to upload to the ftp site.
 - e) With both "My Computer" and the ftp site open in separate windows, drag and drop the file(s) from "My Computer" to the ftp window.
- 3) Send E-mail Notifications to the Environmental Cleanup Oversight Programs
 - a) Send email to deh.loptoxic@acgov.org notify us that you have placed a report on our ftp site.
 - b) Copy your Caseworker on the e-mail. Your Caseworker's e-mail address is the entire first name then a period and entire last name @acgov.org. (e.g., firstname.lastname@acgov.org)
 - c) The subject line of the e-mail must start with the RO# followed by **Report Upload.** (e.g., Subject: RO1234 Report Upload) If site is a new case without an RO#, use the street address instead.
 - d) If your document meets the above requirements and you follow the submission instructions, you will receive a notification by email indicating that your document was successfully uploaded to the ftp site.